

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**UNITED STATES OF AMERICA,** :

**-against-** : **O7 Cr. 837 (VM)**

**DIN CELAJ, et al.** : **NOTICE OF MOTION**

**Defendants.** :

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\_\_\_\_PLEASE TAKE NOTICE that, upon the attached affirmation, the attached affidavit, the attached exhibit, the accompanying memorandum of law, and all prior papers and proceedings, defendant Rabindra Singh will move this Court before the Honorable Victor Marerro, District Judge, on August 1, 2008, at 9:30 a.m., or as soon thereafter as counsel may be heard, at the United States District Courthouse located at 500 Pearl Street, New York, New York, for an order:

- (1) Granting Singh a separate trial from that of his co-defendants;
- (2) Directing the government to provide a bill of particulars;
- (3) Granting Singh the relief sought in motions submitted on behalf of co-defendants, to the extent that it is applicable, and applying any applicable facts or arguments presented in those motions to the present application;
- (4) Ordering an evidentiary hearing to resolve any factual disputes necessary to determination of the present application; and

(5) granting such other and further relief as the court may deem just and proper.

Yours, etc.

/s/  
LAWRENCE GERZOG  
*Attorney for Defendant*  
*Rabindra Singh*  
251 East 61st Street  
New York, New York 10021  
(212) 486-3003

Dated: New York, New York  
August 1, 2008

TO: Clerk, United States District Court  
Southern District of New York

Katherine Goldstein, Esq.  
Assistant United States Attorney